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11 Attorneys for Defendants
12 MOHAMED NASSER and ASKANDAR ALI ALMAWORI

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DARREN GILBERT,

Plaintiff,

vs.

PAUL OIL COMPANY, INC.; MOHAMED
NASSER dba SAM'S MINI MART;
ASKANDAR ALI ALMAWORI dba SAM'S
MINI MART;

Defendants.

Case No. 1:22-cv-00087-DAD-EPG

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANTS NASSER AND
ALMAWORI TO RESPOND TO INITIAL
COMPLAINT**

(ECF No. 16)

IT IS HEREBY STIPULATED by and between Plaintiff DARREN GILBERT ("Plaintiff") and Defendants PAUL OIL COMPANY, INC., MOHAMED NASSER (sued herein as "MOHAMED NASSER dba SAM'S MINI MART") and ASKANDAR ALI ALMAWORI (sued herein as "ASKANDAR ALI ALMAWORI dba SAM'S MINI MART") (collectively "Defendants") (Plaintiff

1 and Defendants are referred to collectively herein as the “Parties”), by and through their attorneys of
2 record, as follows:

3 1. Plaintiff agrees to give Defendants an extension of time to respond to the Complaint.

4 2. The original due date for Defendants to respond to the Complaint is on May 6, 2022 (pursuant
5 to the Court’s Order of 4/8/2022).

6 3. It is agreed and stipulated that the new due date for Defendants to respond to the Complaint
7 will be June 3, 2022. This extension of time is Defendant’s first extension following the setting aside of
8 Defendants’ defaults in this matter and does not alter the date of any event or deadline already fixed by
9 Court order.

10 The Parties jointly request that the Court enter an Order consistent with the foregoing. Good
11 cause exists for this extension for the purpose of reducing fees and costs, as counsel have explored
12 settlement in this action, are actively involved in settlement negotiations, and believe that the additional
13 time to investigate this matter and engage in further settlement discussions that will be afforded by the
14 requested extension of time to respond to the Complaint will facilitate, and increase the chances of, early
15 settlement of this matter. It is hoped that, as a result of the requested continuance and additional time to
16 investigate and negotiate, a settlement as to all claims and all Parties will be reached in this matter.

17
18 DATED: 5/4/2022

MOORE LAW FIRM, P.C.

20 By: /s/ Tanya E. Moore

21 Tanya E. Moore, Esq.

22 Attorneys for Plaintiff

DARREN GILBERT

23
24 DATED: 5/4/2022

THE KARLIN LAW FIRM LLP

25 By: /s/ Rex T. Reeves

26 Rex T. Reeves, Esq.

27 Attorneys for Defendants

MOHAMED NASSER and

ASKANDAR ALI ALMAWORI

ORDER

Pursuant to the parties' stipulation (ECF No. 16), IT IS ORDERED that the deadline for Defendants Nasser and Almawori to respond to the complaint is extended to June 3, 2022.

IT IS SO ORDERED.

Dated: May 4, 2022

/S/ Eric P. Grujic

UNITED STATES MAGISTRATE JUDGE

1 **SIGNATURE ATTESTATION**
2

3 I, Rex T. Reeves, attest that all other signatories listed, and on whose behalf the filing is submitted,
4 concur in the filing's content and have authorized the filing using their /s/ electronic signature, as
4 authorized on the date next to their /s/ signature.

5 DATED: 5/4/2022
6

7 By: /s/ Rex T. Reeves
7 Rex T. Reeves, Esq.
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